

AO 93 (Rev. 11/13) Search and Seizure Warrant

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

2018 AUG -7 PM 1:45

DISTRICT COURT
SOUTHERN DIST. OHIO
EAST DIV. COLUMBUSIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Facebook Inc.
1601 Willow Road
Menlo Park, California 94025

Case No. 2:18mj500

SEARCH AND SEIZURE WARRANT

To: Any authorized law enforcement officer

An application by a federal law enforcement officer or an attorney for the government requests the search
of the following person or property located in the Southern District of Ohio
(identify the person or describe the property to be searched and give its location):

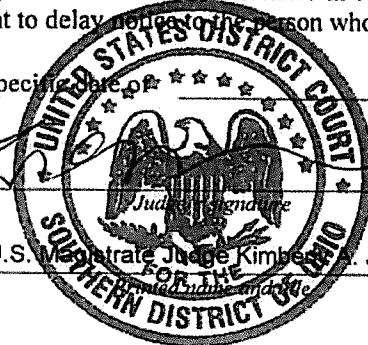
See Attachment A

I find that the affidavit(s), or any recorded testimony, establish probable cause to search and seize the person or property
described above, and that such search will reveal (identify the person or describe the property to be seized):

See Attachment B

☒ YOU ARE COMMANDED to execute this warrant on or before July 13, 2018 (not to exceed 14 days)
in the daytime 6:00 a.m. to 10:00 p.m. ☐ at any time in the day or night because good cause has been established.Unless delayed notice is authorized below, you must give a copy of the warrant and a receipt for the property taken to the
person from whom, or from whose premises, the property was taken, or leave the copy and receipt at the place where the
property was taken.The officer executing this warrant, or an officer present during the execution of the warrant, must prepare an inventory
as required by law and promptly return this warrant and inventory to any US magistrate judge (SD Ohio)
(United States Magistrate Judge)☐ Pursuant to 18 U.S.C. § 3103a(b), I find that immediate notification may have an adverse result listed in 18 U.S.C.
§ 2705 (except for delay of trial), and authorize the officer executing this warrant to delay notification to the person who, or whose
property, will be searched or seized (check the appropriate box)☐ for days (not to exceed 30) ☐ until, the facts justifying, the later specific date Date and time issued: June 29, 2018 10:25 AMCity and state: Columbus, Ohio

U.S. Magistrate Judge Kimberly L. Jolson



ATTACHMENT A

DESCRIPTION OF PROPERTY TO BE SEARCHED

This warrant applies to information associated with the following Facebook accounts which are stored at premises owned, maintained, controlled, or operated by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025:

1. Facebook User ID: : 100002010478304
2. Facebook User ID: 941397812565274

ATTACHMENT B

PARTICULAR THINGS TO BE SEIZED

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment B is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each of the administrator/s of Facebook accounts listed in Attachment A:

(a) All contact and personal identifying information, including for user IDs listed in Attachment A: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos uploaded by the user IDs or Facebook accounts associated with the email addresses of the administrators, and all photos uploaded by any user that have that user tagged in them together with any and all photos identified by Facebook using Facebook's facial-recognition software to match the images uploaded by the user IDs;

(d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the administrator is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the administrator's access and use of Facebook applications for the administrator/s;

(e) All other records of communications and messages made or received by the administrator/s, including all private messages, chat history, video calling history, and pending "Friend" requests for the administrator/s;

(f) All "check ins" and other location information for the administrator/s;

(g) All IP logs, including all records of the IP addresses that logged into the account for the administrator/s;

(h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook web pages and content that the administrator has "liked;"

(i) All information about the Facebook pages that the account is or was a "fan" of;

(j) All past and present lists of friends created by the account;

(k) All records of Facebook searches performed by the administrator/s;

(l) All information about the administrator's access and use of Facebook Marketplace;

(m) The length of service (including start date), the types of service utilized by the administrator, and the means and source of any payments associated with the service (including any credit card or bank account number);

(n) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the administrator/s;

(o) All records pertaining to communications between Facebook and any person regarding the Facebook account, including contacts with support services and records of actions taken;

(p) All machine cookies associated with the target accounts;

(q) All other Facebook accounts linked to the target accounts through machine cookie analysis.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 1425 and 18 U.S.C. § 1015 involving HUSSEIN GULED ADAM aka Abdifatah Farah Hersi, including, for each account or service listed on Attachment A, information pertaining to the following matters:

a. Communications and records, including, but not limited to, all messenger activity, private messages, chat history, video and voice calling history, and pending “friend” requests;

b. Communications and records relating to statements made to the FBI;

c. Evidence indicating how and when the Facebook account was created, accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;

c. Evidence indicating the Facebook account owner’s state of mind as it relates to the crime under investigation;

d. The identity of the person(s) who created or used the user IDs, including records that help reveal the whereabouts of such person(s).

e. The identity of the person(s) who communicated with the user IDs about matters relating to the provision of unlawful procuring of naturalization or citizenship, including records that help reveal their whereabouts.

AO 106 (Rev. 04/10) Application for a Search Warrant

UNITED STATES DISTRICT COURT

for the
Southern District of Ohio

2018 JUN 29 AM 10:28

U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
EAST. DIV. COLUMBUSIn the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)Facebook Inc.
1601 Willow Road
Menlo Park, California 94025

Case No.

2:18mj500

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

See Attachment A

located in the Southern District of Ohio, there is now concealed (identify the person or describe the property to be seized):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☐ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section
18 U.S.C. § 1425Offense Description
Knowingly procured or attempted to procure, unlawfully, naturalization, or citizenship.

18 U.S.C. § 1015

Using a certificate of naturalization knowing it to have been procured by fraud

The application is based on these facts:

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Sworn to before me and signed in my presence.

Date:

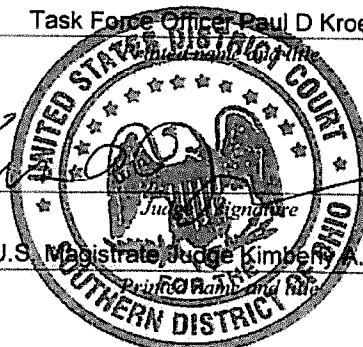
June 29, 2018

City and state: Columbus, Ohio

Applicant's signature

Task Force Officer Paul D Kroeger

U.S. Magistrate Judge Kimberly A. Jolson



ATTACHMENT A

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2. Facebook User ID: 941397812565274

ATTACHMENT B

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(a) All contact and personal identifying information, including for user IDs listed in Attachment A: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos uploaded by the user IDs or Facebook accounts associated with the email addresses of the administrators, and all photos uploaded by any user that have that user tagged in them together with any and all photos identified by Facebook using Facebook's facial-recognition software to match the images uploaded by the user IDs;

- (d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the administrator is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the administrator's access and use of Facebook applications for the administrator/s;
- (e) All other records of communications and messages made or received by the administrator/s, including all private messages, chat history, video calling history, and pending "Friend" requests for the administrator/s;
- (f) All "check ins" and other location information for the administrator/s;
- (g) All IP logs, including all records of the IP addresses that logged into the account for the administrator/s;
- (h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook web pages and content that the administrator has "liked;"
- (i) All information about the Facebook pages that the account is or was a "fan" of;
- (j) All past and present lists of friends created by the account;
- (k) All records of Facebook searches performed by the administrator/s;
- (l) All information about the administrator's access and use of Facebook Marketplace;
- (m) The length of service (including start date), the types of service utilized by the administrator, and the means and source of any payments associated with the service (including any credit card or bank account number);

(n) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the administrator/s;

(o) All records pertaining to communications between Facebook and any person regarding the Facebook account, including contacts with support services and records of actions taken;

(p) All machine cookies associated with the target accounts;

(q) All other Facebook accounts linked to the target accounts through machine cookie analysis.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 1425 and 18 U.S.C. § 1015 involving HUSSEIN GULED ADAM aka Abdifatah Farah Hersi, including, for each account or service listed on Attachment A, information pertaining to the following matters:

- a. Communications and records, including, but not limited to, all messenger activity, private messages, chat history, video and voice calling history, and pending “friend” requests;
- b. Communications and records relating to statements made to the FBI;
- c. Evidence indicating how and when the Facebook account was created, accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;
- c. Evidence indicating the Facebook account owner’s state of mind as it relates to the crime under investigation;

d. The identity of the person(s) who created or used the user IDs, including records that help reveal the whereabouts of such person(s).

e. The identity of the person(s) who communicated with the user IDs about matters relating to the provision of unlawful procuring of naturalization or citizenship, including records that help reveal their whereabouts.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF
INFORMATION ASSOCIATED WITH
FACEBOOK USER ID'S:

UID: 100002010478304; and
UID: 941397812565274

2:18mj500

**AFFIDAVIT IN SUPPORT OF AN
APPLICATION UNDER RULE 41 FOR A
WARRANT TO SEARCH AND SEIZE**

I, Paul D. Kroeger, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of an application for a search warrant for information associated with the following Facebook user IDs:
 - a. Facebook User ID: 100002010478304
 - b. Facebook User ID: 941397812565274

This information is stored at the premises owned, maintained, controlled, or operated by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025 (hereinafter referred to as "Facebook" and described in Attachment A). This affidavit is made in support of an application for a search warrant under Title 18, United States Code, Sections 2703(a), (b)(1)(A), and (c)(1)(A) to require Facebook to disclose to the government copies of the information in its possession (including the content of communications) further described in Section I of Attachment B.

2. Your Affiant is a Deputy Sheriff with the Franklin County Sheriff's Office. Your Affiant has been a Deputy Sheriff for 21 years, and has been assigned as a Task Force Officer

("TFO") for the Federal Bureau of Investigation (FBI) Joint Terrorism Task Force ("JTTF") for five years. During my current assignment at the JTTF, I have been a Case Agent and Co-Case Agent for multiple international terrorism investigations. While assigned to the JTTF, your Affiant has received specialized training in international terrorism. Furthermore, I have received training in computer-related crimes as well as the criminal use of email, social media, and telephonic communications.

3. The statements contained herein are based on an investigation conducted by your Affiant, my experience and training as a TFO on the JTTF, and other relevant information provided to me by other TFOs and FBI Special Agents. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of your Affiant's knowledge about this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. All dates are on or about the specified date.

4. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that HUSSEIN GULED ADAM aka Abdifatah Farah Hersi, (hereinafter referred to as "ADAM") knowingly procured or attempted to procure, unlawfully, naturalization, or citizenship, in violation of 18 U.S.C. § 1425 and used a certificate of naturalization knowing it to have been procured by fraud, in violation of 18 U.S.C. § 1015.

PROBABLE CAUSE

5. The target of the investigation is HUSSEIN GULED ADAM (ADAM) aka

Abdifatah Farah Hersi, date of birth October 15, 1978, Social Security Number [REDACTED]

6. On or about March 28, 2018, United States citizen [REDACTED] was interviewed by the FBI. [REDACTED] stated that ADAM was formerly a member of al-Ittihad al-Islamia (AIAI), and that ADAM came to the United States illegally. [REDACTED] indicated that ADAM paid a family who was granted refugee status, and entered the United States with that family. According to [REDACTED], ADAM did this to flee his past, and to gain legal entry into the United States.

7. The information provided by [REDACTED] led the FBI to interview numerous other United States citizens, and discover allegations that ADAM had previously lived in Somalia under the name of HUSSEIN GULED ADAM. The evidence indicates that ADAM then changed his name to Abdifatah Farah Hersi, in order to appear to be a member of the family who was granted refugee status to the United States. ADAM entered the United States with this family in May of 2000.

8. Section 411 of the USA PATRIOT Act (8 U.S.C. § 1182), authorized the Secretary of State to designate terrorist organizations for purposes of immigration. This authority became known as the "Terrorist Exclusion List" authority. On or about December 5, 2001, AIAI was placed on the "Terrorist Exclusion List." AIAI is an organized Islamic group whose goal was the establishment of an Islamic State. AIAI committed terrorist acts in Somalia and Ethiopia in the mid-1990s and remains on the government's Terrorist Exclusion List.

9. [REDACTED], a United States citizen was interviewed in May of 2018. [REDACTED] was asked about terrorist organizations in the Gedo region of Somalia, and mentioned the name Hussein Guled as being a member of AIAI. Based on [REDACTED]'s description of the person [REDACTED] knew to be Hussein Guled, investigators believe Hussein Guled to be ADAM. [REDACTED] knew that ADAM was a member

of AIAI in the Gedo region of Somalia in the 1990's and that ADAM now lived in Columbus, Ohio. [REDACTED] was asked about the name Abdifatah Farah Hersi. [REDACTED] had never heard that name before and did not know anyone by that name. [REDACTED] lived in Somalia during the 1990's and had extensive knowledge about the region and AIAI.

10. During an interview of [REDACTED], a United States citizen, it was determined that ADAM was introduced to [REDACTED] as "Hussein Guled" shortly before he entered the United States as a refugee along with the family under the name Abdifatah Farah Hersi. According to [REDACTED], ADAM stayed around for approximately two months after arriving in the United States, and then left the family after receiving his Social Security card.

11. A review of the immigration file of ADAM revealed that he used the name Abdifatah Farah Hersi, in applying for refugee status and naturalization. The last name of Hersi matches the name of the family he entered the United States with in May of 2000. After he was naturalized on June 30, 2008, "Hersi" legally changed his name to HUSSEIN GULED ADAM, which your Affiant submits was his name originally. Several other discrepancies were discovered when reviewing the immigration file for ADAM.

12. On or about June 30, 2008, Hussein Guled Adam (ADAM), using a date of birth of October 15, 1978 and a social security number of [REDACTED] 3, became a naturalized United States (U.S.) citizen. Your Affiant submits that ADAM unlawfully procured U.S. citizenship under a false name, to wit Abdifatah Farah Hersi (Hersi), date of birth October 15, 1978, in violation of Title 18 U.S.C. §§ 1425 and 1015.

Application for Refugee Status

13. On or about September 21, 1999, ADAM completed and signed U.S. Department of Justice (USDOJ) Immigration and Naturalization Service (INS) Form I-590, Registration for Classification as Refugee, stating the following:

- a) his name was Abdifatah Farah Hersi;
- b) his date of birth was October 15, 1978; and
- c) that he had no children.

14. On or about September 22, 1999, ADAM, using the false identity of Hersi stated the following to a Joint Voluntary Agency/Kenya Caseworker:

- a) he was born in Mogadishu, Somali in 1978; and
- b) that he was single with no children.

15. On or about January 14, 2000, ADAM swore to the truth of the information he provided in Form I-590 to a U.S. Immigration Officer in Nairobi, Kenya.

16. On or about May 23, 2000, ADAM fraudulently entered the U.S. as a refugee under the false identity of Hersi.

Application for Permanent Residence Status

17. On or about July 18, 2001, ADAM completed and signed USDOJ INS Form I-485, Application to Register Permanent Residence or Adjust Status, under the false identity Hersi, stating the following:

- a) his name was Abdifatah F. Hersi;

- b) his date of birth was October 15, 1978;
- c) his mother's name was [REDACTED];
- d) that he had no sons or daughters; and
- e) that he had no present or past memberships in or affiliations with any political organizations, associations, funds, foundations, parties, clubs, societies, or similar groups in the U.S. or in other places since his 16th birthday.

18. On or about August 2, 2001, ADAM completed and signed USDOJ INS Form G-325, Biographic Information, under the false identity Hersi, listing P.O. Box 71587, Nairobi, Kenya, as his residence from July 1997 through May 2000 on the G-325. This is the same address listed for "Hussein Guled" on a letter from the U.S. DOJ INS conditionally approving the refugee status of Hersi and the family with whom he entered on January 14, 2000.

19. On or about February 21, 2002, ADAM's I-485 was approved, granting him legal permanent resident status in the United States.

Application for Naturalization

20. On or about March 23, 2005, ADAM completed and signed USDOJ INS Form N-400, Application for Naturalization, under a false identity, stating the following:

- a) his name was Abdifatah Farah Hersi;
- b) his date of birth was October 15, 1978;
- c) an email [REDACTED]@hotmail.com;
- d) that he had no sons or daughters;
- e) that he had never been a member of or associated with any organization, association, fund, foundation, party, club, society, or similar group in the U.S. or any other place;
- f) that he had never given false or misleading information to any U.S. government official while applying for any immigration benefit or to prevent deportation, exclusion, or removal; and
- g) that he had never lied to any U.S. government official to gain entry or admission into the United States.

21. On or about June 19, 2006, ADAM swore and certified under penalty of perjury under the laws of the United States of America that the information in his application for naturalization was true and correct to a U.S. Immigration Officer.

22. On or about December 8, 2006, ADAM, using the false identity Hersi obtained a Uganda Muslim Supreme Council Certificate of Marriage purporting to establish his marriage to [REDACTED] Warsame, age 32 years, on December 6, 2006.

23. On or about April 10, 2007, ADAM, using the false identity Hersi, completed Affidavit of Relationship for his wife, [REDACTED] Warsame, date of birth [REDACTED], date of marriage December 8, 2006.¹ ADAM listed his mother as [REDACTED] Abdille. ADAM did not list any children on the affidavit as required by the language contained within the document.

24. On or about June 16, 2008, ADAM again swore and certified under penalty of perjury under the laws of the United States of America that the information in his application for naturalization was true and correct to a U.S. Immigration Officer. On his N-400, ADAM indicated he wanted to legally change his name to HUSSEIN GULED ADAM.

25. On or about June 30, 2008, ADAM completed and signed U.S. Department of Justice (USDOJ) Immigration and Naturalization Service (INS) Form N-445, Notice of Naturalization Oath Ceremony, under a false identity, stating the following:

- a) his name as Abdifatah; and
- b) that he had not given any false testimony to obtain immigration benefits.

¹ Affiant is unclear as to why this date is different than what is listed on the Certificate of Marriage.

Petitions for ADAM's Sons

26. On or about October 15, 2014, ADAM submitted I-130s, Petitions for Alien Relatives, for his sons [REDACTED], date of birth [REDACTED], and [REDACTED] [REDACTED] date of birth [REDACTED]. Importantly, ADAM did not list these children on any of his prior immigration documents or applications, even though their births pre-date his entry into the U.S. as a refugee; rather, as noted above, he falsely represented that he had no children. On the I-130s, ADAM listed his date and place of present marriage as December 6, 2006, Kampala, Uganda and submitted a copy of his Certificate of Marriage with [REDACTED] Warsame. In order to establish his eligibility to submit petitions on behalf of his sons, ADAM submitted his fraudulently obtained Certificate of Naturalization in support of each I-130, in violation of 18 U.S.C. § 1015.

27. On or about May 28, 2015, the I-130s ADAM filed for his sons [REDACTED] were approved.

28. On or about March 31, 2017, DNA Test Reports document the probability of paternity between ADAM and each of the sons, [REDACTED] is 99.999998%.

29. Based on your Affiant's experience and knowledge of Somali culture and family lineage, children are given a unique name and then take their father's first name followed by their paternal grandfather's first name, i.e. Hussein Guled Adam's biological children would be named as follows: "unique name," Hussein Guled. If Hersi had been ADAM's true name, his biological children would have been named [REDACTED] Abdifatah Farah and [REDACTED] Abdifatah Farah. Instead,

their names are [REDACTED] *Hussein Guled* and [REDACTED] *Hussein Guled*. (Emphasis added). Also, it follows that ADAM's father's first name would be Hussein and his grandfather's first name would be Guled.

30. On or about December 27, 2017, [REDACTED] entered the U.S. as a legal permanent resident. To date, [REDACTED] visa application to enter the U.S. is still pending.

Other False Identity Evidence

31. A search of Facebook, a social networking website, at www.facebook.com for the name "Hussein Guled Adam" resulted in the identification of two Facebook accounts using the name "Hussein Guled Adam," which the Affiant believes are used by ADAM. The first account is a public figure page uniquely identified by the URL www.facebook.com/hussein.g.adam and Facebook identification number 941397812565274. Your Affiant knows this page is used by ADAM based on ADAM identifying this page in a March 2018 interview with the FBI. The second account is a personal page uniquely identified by the URL www.facebook.com/hussein.g.adam.9 and Facebook Identification number 100002010478304. The Affiant believes this page is used by ADAM due to the use of the name of Hussein Guled Adam, the listing of Masjid Attaqwa Community Center, where ADAM works, and numerous photographs posted that resemble ADAM. Legal documents received from Facebook on or about June 13, 2018 identify the creator of Facebook identification numbers 941397812565274 and 100002010478304 as Hussein Guled Adam. A telephone number of 1-614-772-8114 was also associated with both accounts. ADAM provided this as his telephone number during a March 9, 2018 FBI interview. Both of the above

listed Facebook accounts were still active as of June, 13 2018. The FBI submitted preservation requests to Facebook for both of the accounts, User ID 100002010478304 on May 25, 2018 and User ID 941397812565274 on May 28, 2018.

32. On or about August 16, 2015, ADAM created a post on his personal Facebook page and wrote the following: today my sister Anab Mohamed Adam Deer passed away in Cairo. Affiant believes due to traditional Somali name lineage, Anab Mohamed Adam Deer could not be a sister to Abdifatah Farah Hersi. The Affiant believes this would make it unlikely that ADAM's real name was actually Abdifatah Farah Hersi, as he represented when he entered the United States in 2000.

33. On or about April 28, 2017, ADAM posted a photo that bears a strong resemblance to him on his personal Facebook page as identified above. Next to the photo, ADAM wrote a poem about a goal he had 30 years ago, but has not yet realized and joked about having more hair in the photo. Based on the date of birth, ADAM has claimed since he applied for U.S. immigration benefits until present, October 15, 1978, he would have been approximately 9 years old at the time. The person in the photo, however, has facial hair, including a mustache and beard, suggesting that the person was significantly older.

34. On or about December 19, 2017, ADAM posted a Somali Police Force logo on his personal Facebook page as identified above. Next to the Somali Police Force logo, ADAM wrote that he joined the Somali Police Training Academy in 1983. Based on the date of birth ADAM has claimed since he applied for U.S. immigration benefits until present, October 15, 1978, he would have been approximately 5 years old at the time. He further writes that he worked for Mogadishu

Criminal Investigations and The Shantaraale Police Station, among other entities.

35. On or about February 6, 2016, ADAM posted a photo of an elderly man on his public figure Facebook page as identified above. In the post, ADAM wrote: besides my two biological parents, you are the other person to whom I owe everything. You brought me out of the rural area as an orphan. You taught me both religion and general school education. ADAM also posts the following comment under the photo: he is my second dad, Xaaji² [REDACTED] Deer. Affiant believes due to the traditional Somali name lineage, [REDACTED] Deer, which translates to [REDACTED] Deer, would likely be a paternal uncle of ADAM. The Affiant believes this would make it unlikely that ADAM's real name was actually Abdifatah Farah Hersi, as he represented when he entered the United States in 2000.

36. On or about March 30, 2016, ADAM posted a photo on his public figure Facebook page as identified above. The photo appears to be several young students and two older men. The Affiant believes this photo was taken well before ADAM entered the U.S. under the name Abdifatah Farah Hersi in 2000. In the post ADAM wrote: this was when we had peace and were students at Gahayr (Somali National University). ADAM also wrote: it was a memorable time. Another person posted the following comment in response to the photo: Xuseen...you welcomed me to the University as the chairman of students. Another person posts the following comment: the tall guy in between the two teachers is xuseen guuleed, I am his uncle and I know him very well. The name "Xuseen Guuleed" translates to Hussein Guled. For this reason Affiant believes ADAM

² Xaaji, which translates to Haji, is most commonly used as a title for Muslims who have been to Mecca as a pilgrim.

was known by the name Hussein Guled prior to coming to the U.S.

37. On or about April 10, 2018, ADAM posted a photo on his public figure Facebook page as identified above. The photo is of a person bearing a strong resemblance to himself next to another older man. The Affiant believes this photo was taken before ADAM entered the U.S. under the name Abdifatah Farah Hersi in 2000. Another person posts the following comment in response to the photo: this is the Xuseen Guuleed I knew. The name "Xuseen Guuleed" translates to Hussein Guled. For this reason Affiant believes ADAM was known by the name Hussein Guled prior to coming to the U.S.

Storage of Identity Records and Documents

38. On or about March 9, 2018, during an FBI interview, your Affiant observed that ADAM possessed a smart phone. During that same interview, ADAM also admitted to having two Facebook accounts: a public figure page and a personal page. ADAM showed your Affiant the public figure page on the smart phone possessed by ADAM during the interview, and therefore, your Affiant knows ADAM accessed and can access his Facebook page using his smart phone.

Technical Background Facebook

39. Facebook owns and operates a free-access social networking website of the same name that can be accessed at <http://www.facebook.com>. Facebook allows its users to establish accounts with Facebook, and users can then use their accounts to share written news, photographs, videos, and other information with other Facebook users, and sometimes with the general public.

40. Facebook asks users to provide basic contact and personal identifying information to Facebook, either during the registration process or thereafter. This information may include the

user's full name, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers (for password retrieval), physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers. Facebook also assigns a user identification number to each account.

41. Facebook users may join one or more groups or networks to connect and interact with other users who are members of the same group or network. Facebook assigns a group identification number to each group. A Facebook user can also connect directly with individual Facebook users by sending each user a "Friend Request." If the recipient of a "Friend Request" accepts the request, then the two users will become "Friends" for purposes of Facebook and can exchange communications or view information about each other. Each Facebook user's account includes a list of that user's "Friends" and a "News Feed," which highlights information about the user's "Friends," such as profile changes, upcoming events, and birthdays.

42. Facebook users can select different levels of privacy for the communications and information associated with their Facebook accounts. By adjusting these privacy settings, a Facebook user can make information available only to himself or herself, to particular Facebook users, or to anyone with access to the Internet, including people who are not Facebook users. A Facebook user can also create "lists" of Facebook friends to facilitate the application of these privacy settings. Facebook accounts also include other account settings that users can adjust to control, for example, the types of notifications they receive from Facebook.

43. Facebook users can create profiles that include photographs, lists of personal interests, and other information. Facebook users can also post "status" updates about their

whereabouts and actions, as well as links to videos, photographs, articles, and other items available elsewhere on the Internet. Facebook users can also post information about upcoming “events,” such as social occasions, by listing the event’s time, location, host, and guest list.

44. In addition, Facebook users can “check in” to particular locations or add their geographic locations to their Facebook posts, thereby revealing their geographic locations at particular dates and times. A particular user’s profile page also includes a “Wall,” which is a space where the user and his or her “Friends” can post messages, attachments, and links that will typically be visible to anyone who can view the user’s profile.

45. Facebook has a Photos application, where users can upload an unlimited number of albums and photos. Another feature of the Photos application is the ability to “tag” (i.e., label) other Facebook users in a photo or video. When a user is tagged in a photo or video, he or she receives a notification of the tag and a link to see the photo or video. For Facebook’s purposes, the photos associated with a user’s account will include all photos uploaded by that user that have not been deleted, as well as all photos uploaded by any user that have that user tagged in them.

46. Facebook users can exchange messages on Facebook with other users. These messages, which are similar to e-mail messages, are sent to the recipient’s “Inbox” on Facebook, which also stores copies of messages sent by the recipient, as well as other information. Facebook users can also post comments on the Facebook profiles of other users or on their own profiles; such comments are typically associated with a specific posting or item on the profile. In addition, Facebook has a Chat feature that allows users to send and receive instant messages through Facebook. These chat communications are stored in the chat history for the account. Facebook also

has a Video Calling feature, and although Facebook does not record the calls themselves, it does keep records of the date of each call.

47. If a Facebook user does not want to interact with another user on Facebook, the first user can “block” the second user from seeing his or her account.

48. Facebook has a “like” feature that allows users to give positive feedback or connect to particular pages. Facebook users can “like” Facebook posts or updates, as well as web pages or content on third-party (*i.e.*, non-Facebook) websites. Facebook users can also become “fans” of particular Facebook pages.

49. Facebook has a search function that enables its users to search Facebook for keywords, usernames, or pages, among other things.

50. Each Facebook account has an activity log, which is a list of the user’s posts and other Facebook activities from the inception of the account to the present. The activity log includes stories and photos that the user has been tagged in, as well as connections made through the account, such as “liking” a Facebook page or adding someone as a friend. The activity log is visible to the user but cannot be viewed by people who visit the user’s Facebook page.

51. Facebook Notes is a blogging feature available to Facebook users, and it enables users to write and post notes or personal web logs (“blogs”), or to import their blogs from other services, such as Xanga, LiveJournal, and Blogger.

52. The Facebook Gifts feature allows users to send virtual “gifts” to their friends that appear as icons on the recipient’s profile page. Gifts cost money to purchase, and a personalized message can be attached to each gift. Facebook users can also send each other “pokes,” which are

free and simply result in a notification to the recipient that he or she has been “poked” by the sender.

53. Facebook also has a Marketplace feature, which allows users to post free classified ads. Users can post items for sale, housing, jobs, and other items on the Marketplace.

54. In addition to the applications described above, Facebook also provides its users with access to thousands of other applications on the Facebook platform. When a Facebook user accesses or uses one of these applications, an update about that the user’s access or use of that application may appear on the user’s profile page.

55. Facebook can identify all users who are currently registered to a particular group and can identify the administrator and/or creator of the group. Facebook uses the term “Group Contact Info” to describe the contact information for the group’s creator and/or administrator, as well as a PDF of the current status of the group profile page.

56. Facebook uses the term “Neoprint” to describe an expanded view of a given user profile. The “Neoprint” for a given user can include the following information from the user’s profile: profile contact information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends’ Facebook user identification numbers; groups and networks of which the user is a member, including the groups’ Facebook group identification numbers; future and past event postings; rejected “Friend” requests; comments; gifts; pokes; tags; and information about the user’s access and use of Facebook applications. To the extent that Facebook may change the label it gives to the data it has called “Neoprint,” I am referring to this same data previously known as “Neoprint.”

57. Facebook also retains Internet Protocol (“IP”) logs for a given user ID or IP address. These logs may contain information about the actions taken by the user ID or IP address on Facebook, including information about the type of action, the date and time of the action, and the user ID and IP address associated with the action. For example, if a user views a Facebook profile, that user’s IP log would reflect the fact that the user viewed the profile, and would show when and from what IP address the user did so.

58. Social networking providers like Facebook typically retain additional information about their users’ accounts, such as information about the length of service (including start date), the types of service utilized, and the means and source of any payments associated with the service (including any credit card or bank account number). In some cases, Facebook users may communicate directly with Facebook about issues relating to their accounts, such as technical problems, billing inquiries, or complaints from other users. Social networking providers like Facebook typically retain records about such communications, including records of contacts between the user and the provider’s support services, as well as records of any actions taken by the provider or user as a result of the communications.

59. Therefore, the computers of Facebook are likely to contain all the material described below, including stored electronic communications and information concerning subscribers and their use of Facebook, such as account access information, transaction information, and other account information.

60. The Affiant determined Facebook pages described herein, prior to their deactivation, were publicly accessible via the Internet if logged into a Facebook user account.

INFORMATION TO BE SEARCHED AND THINGS TO BE SEIZED

61. I anticipate executing this warrant under the Electronic Communications Privacy Act, in particular 18 U.S.C. §§ 2703(a), 2703(b)(1)(A) and 2703(c)(1)(A), by using the warrant to require Facebook to disclose to the government copies of the records and other information (including the content of communications) particularly described in Section I of Attachment B. Upon receipt of the information described in Section I of Attachment B, government-authorized persons will review that information to locate the items described in Section II of Attachment B.

CONCLUSION

62. Based on the foregoing, your Affiant believes there is probable cause that ADAM unlawfully procured U.S. citizenship under a false identity, to wit Abdifatah Farah Hersi. The evidence indicates that ADAM's true name is Hussein Guled Adam, and that the date of birth provided to U.S. immigration is false. Your Affiant submits that ADAM used a fake date of birth suggesting a younger age to aid in the process of coming over as a "son" in a refugee family, but that his own admissions and identifications of photographs on Facebook reveal that he is actually much older. Moreover, several people interviewed indicated that ADAM was known to them only as Hussein Guled Adam, that they were unaware of him being known by the name Abdifatah Farah Hersi, and that he entered the U.S. under a false identity. ADAM also failed to disclose his affiliation with AIAI and the Somali Police Force on his N-400, Application for Naturalization, as required. This information would have been material to determine his true identity. Finally, ADAM's biological children, as established by DNA, were born prior to his entry into the U.S. under the name Abdifatah Farah Hersi, but they do not carry that name as is customary in Somali

culture and family lineage. Instead, they carry his true name of Hussein Guled.

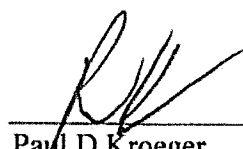
63. Based on the Affiant's training and experience, Facebook is used to communicate with family, friends and other associates through public posts, as well as private messages. A review of ADAM's personal and public figure Facebook pages reveal numerous posts relating to his family, including his biological sons, and historical photos pre-dating his entry into the U.S. Private messages, including messages sent through the Chat and Messenger features on Facebook, are not publically viewable, therefore a warrant is needed to obtain the records. The Affiant believes Facebook records, including the private messages, in addition to the other information that is stored by Facebook, will contain further evidence of ADAM's true identity.

64. Based on the foregoing, there is probable cause to believe ADAM unlawfully procured U.S. citizenship in violation of 18 U.S.C. § 1425 and used a fraudulently procured certificate of naturalization in violation of 18 U.S.C. § 1015, and that evidence will be found within the Facebook records for User accounts 100002010478304 and 941397812565274. Therefore, the Affiant requests the purposed search warrant.

65. This Court has jurisdiction to issue the requested warrant because it is "a court of competent jurisdiction" as defined by 18 U.S.C. § 2711(3)(A)(i), 18 U.S.C. §§ 2703(a), (b)(1)(A) & (c)(1)(A). Specifically, the Court is a district court of the United States that has jurisdiction over the offense being investigated.

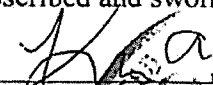
66. Pursuant to 18 U.S.C. § 2703(g), the presence of a law enforcement officer is not required for the service or execution of this warrant.

Respectfully submitted,

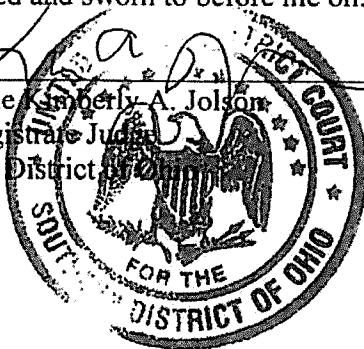


Paul D Kroeger
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn to before me on:



Honorable Kimberly A. Jolson
U.S. Magistrate Judge
Southern District of Ohio



ATTACHMENT A

DESCRIPTION OF PROPERTY TO BE SEARCHED

This warrant applies to information associated with the following Facebook accounts which are stored at premises owned, maintained, controlled, or operated by Facebook Inc., 1601 Willow Road, Menlo Park, California 94025:

1. Facebook User ID: : 100002010478304
2. Facebook User ID: 941397812565274

ATTACHMENT B

PARTICULAR THINGS TO BE SEIZED

I. Information to be disclosed by Facebook

To the extent that the information described in Attachment B is within the possession, custody, or control of Facebook, including any messages, records, files, logs, or information that have been deleted but are still available to Facebook, or have been preserved pursuant to a request made under 18 U.S.C. § 2703(f), Facebook is required to disclose the following information to the government for each of the administrator/s of Facebook accounts listed in Attachment A:

(a) All contact and personal identifying information, including for user IDs listed in Attachment A: full name, user identification number, birth date, gender, contact e-mail addresses, Facebook passwords, Facebook security questions and answers, physical address (including city, state, and zip code), telephone numbers, screen names, websites, and other personal identifiers.

(b) All activity logs for the account and all other documents showing the user's posts and other Facebook activities;

(c) All photos uploaded by the user IDs or Facebook accounts associated with the email addresses of the administrators, and all photos uploaded by any user that have that user tagged in them together with any and all photos identified by Facebook using Facebook's facial-recognition software to match the images uploaded by the user IDs;

(d) All profile information; News Feed information; status updates; links to videos, photographs, articles, and other items; Notes; Wall postings; friend lists, including the friends' Facebook user identification numbers; groups and networks of which the administrator is a member, including the groups' Facebook group identification numbers; future and past event postings; rejected "Friend" requests; comments; gifts; pokes; tags; and information about the administrator's access and use of Facebook applications for the administrator/s;

(e) All other records of communications and messages made or received by the administrator/s, including all private messages, chat history, video calling history, and pending "Friend" requests for the administrator/s;

(f) All "check ins" and other location information for the administrator/s;

(g) All IP logs, including all records of the IP addresses that logged into the account for the administrator/s;

(h) All records of the account's usage of the "Like" feature, including all Facebook posts and all non-Facebook web pages and content that the administrator has "liked;"

(i) All information about the Facebook pages that the account is or was a "fan" of;

(j) All past and present lists of friends created by the account;

(k) All records of Facebook searches performed by the administrator/s;

(l) All information about the administrator's access and use of Facebook Marketplace;

(m) The length of service (including start date), the types of service utilized by the administrator, and the means and source of any payments associated with the service (including any credit card or bank account number);

(n) All privacy settings and other account settings, including privacy settings for individual Facebook posts and activities, and all records showing which Facebook users have been blocked by the administrator/s;

(o) All records pertaining to communications between Facebook and any person regarding the Facebook account, including contacts with support services and records of actions taken;

(p) All machine cookies associated with the target accounts;

(q) All other Facebook accounts linked to the target accounts through machine cookie analysis.

II. Information to be seized by the government

All information described above in Section I that constitutes fruits, evidence and instrumentalities of violations of 18 U.S.C. § 1425 and 18 U.S.C. § 1015 involving HUSSEIN GULED ADAM aka Abdifatah Farah Hersi, including, for each account or service listed on Attachment A, information pertaining to the following matters:

a. Communications and records, including, but not limited to, all messenger activity, private messages, chat history, video and voice calling history, and pending “friend” requests;

b. Communications and records relating to statements made to the FBI;

c. Evidence indicating how and when the Facebook account was created, accessed or used, to determine the chronological and geographic context of account access, use, and events relating to the crime under investigation and to the Facebook account owner;

c. Evidence indicating the Facebook account owner’s state of mind as it relates to the crime under investigation;

d. The identity of the person(s) who created or used the user IDs, including records that help reveal the whereabouts of such person(s).

c. The identity of the person(s) who communicated with the user IDs about matters relating to the provision of unlawful procuring of naturalization or citizenship, including records that help reveal their whereabouts.

**CERTIFICATE OF AUTHENTICITY OF DOMESTIC
BUSINESS RECORDS PURSUANT TO FEDERAL RULE
OF EVIDENCE 902(11)**

I, _____, attest, under penalties of perjury under the laws of the United States of America pursuant to 28 U.S.C. § 1746, that the information contained in this declaration is true and correct. I am employed by Facebook Inc., and my official title is _____. I am a custodian of records Facebook Inc. I state that each of the records attached hereto is the original record or a true duplicate of the original record in the custody of Facebook Inc., and that I am the custodian of the attached records consisting of _____ (pages/CDs/kilobytes). I further state that:

- a. all records attached to this certificate were made at or near the time of the occurrence of the matter set forth, by, or from information transmitted by, a person with knowledge of those matters;
- b. such records were kept in the ordinary course of a regularly conducted business activity of Facebook Inc. and
- c. such records were made by Facebook Inc. as a regular practice.

I further state that this certification is intended to satisfy Rule 902(11) of the Federal Rules of Evidence.

Date

Signature